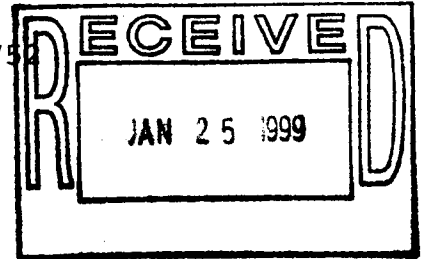


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CONCERNING THE NOMINATION TO LIST ENVIRONMENTAL TOBACCO SMOKE
IN THE 9TH REPORT ON CARCINOGENS

As an educated citizen, I've followed the campaign against environmental tobacco smoke (ETS) with increasing dismay. It's become clear, were there not such zeal to bring about a "smoke-free" society, the ETS controversy would have been put to rest some time ago, because the evidence that ETS causes cancer in non-smokers has not, despite heroic efforts by researchers, come forth.

Though neither an epidemiologist nor a toxicologist, I possess a Doctor of Philosophy in Organizational Behavior from the City University of New York, and the requisite knowledge to discern the very large gap between what has been found empirically, and what the tobacco control establishment apparently wishes were true.

I will discuss just a few important points:

At best, the epidemiology research results are equivocal. Throughout the large body of research, the overwhelming majority of the risk ratios fail to reach statistical significance. Under normal conditions of science--as opposed to the political conditions of ETS science--this alone would have called into question the value of this line of inquiry. This was true for the Environmental Protection Agency's (EPA) report, which continues to be cited as a major basis for arguments against ETS. It remains true in one of the most recently released studies, performed by the International Agency for Research on Cancer (IARC), published in the Journal of the National Cancer Institute, V90, No.19, October 7, 1998--and which seems to have been omitted from NTS's assesment. There was ample time for the Carcinogens Subcommittee to have reviewed this important IARC study, certainly in a preprint, and Western Europe, where the study was conducted, is sufficiently similar to the United States in standard of living and life-style to have merited its inclusion. Its omission might be considered "cherry-picking".

The explanation offered for these aforementioned primarily null results is that the risk is very small and therefore difficult to detect--"but we know it's there". Continued "belief" in a theory, however plausible it may seem, in the absence of proof, and despite a large number of failed research efforts to obtain proof, takes on the characteristics of dogma, or of a secular religion. Science requires experimental proof.

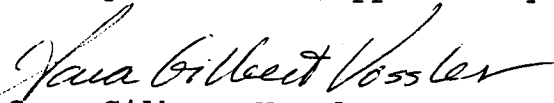
The EPA Report was struck down in Federal court on July 17, 1998 by District Judge William Osteen as being virtually fraudulent. That the EPA is appealing this decision is not surprising--it has spent very large sums of the people's money developing and promoting the report, and has to try to justify such expenditures. I'm certain NTP is aware of the ruling, and has access to the document, which is very thorough and detailed. It seems to me that this important analysis should have signalled the Subcommittee to at least delay any decision about ETS.

The argument of "biological plausibility", based on active smoking, remains just that--an unresolved argument, which means it could go either way. The experimental proof required by science, to show that the very small amounts of environmental tobacco smoke, as opposed to the much larger amounts (and of apparently somewhat different chemical makeup) from active smoking, has similar carcinogenic effects on humans, does not exist.

Finally, it's very important to keep in mind that NTP's actions will affect human relationships. This means that unintended and unpredictable consequences are sure to follow, as they always have when governments have tried to change behavior.

Unhappily, good intentions do not guarantee good results. And, especially with the evident lack of solid evidence that ETS is truly a danger, it would not only be false to officially declare ETS a human carcinogen, but also incautious, because it would be unnecessarily tinkering with complex human and societal factors that none of us fully understand.

Thankyou for the opportunity to present my comments.


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